

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Criminal No. 1:18-cr-00083-TSE

Judge T. S. Ellis, III

Trial Date: July 25, 2018

**DEFENDANT PAUL J. MANAFORT JR.'S RESPONSE
TO THE COURT'S PROPOSED JURY QUESTIONNAIRE**

On July 11, 2018, the Court issued an order to provide a jury questionnaire for all potential jurors in this case. The Court also invited the parties to propose changes to the Court's proposed jury questionnaire. Pursuant to the Court's order and Rule 24 of the Federal Rules of Criminal Procedure, defendant, Paul J. Manafort, Jr., respectfully requests that the Court include the following questions in the jury questionnaire:

1. What is your main source for news? [Check the one you rely on the most.]

_____ Newspapers/Magazines
_____ TV or Radio
_____ Internet/Social media websites

2. Please list any newspapers, magazines, TV or radio shows, or Internet or social media websites that you read, watch, or listen to on a regular basis:

3. Have you, any member of your immediate family, or any close personal friend ever run for or held a political office in the federal, state, or local government?

_____ Yes _____ No

- A. If yes, would anything about that person's running for or holding political office cause you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

- B. If yes, please explain:

3. Have you ever been a volunteer, member, or contributor to a political campaign or political party?

_____ Yes _____ No

- A. If yes, would anything about that experience cause you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

- B. If yes, please explain:

2. Did you vote in the 2016 Presidential Election?

_____ Yes _____ No

Respectfully submitted,

s/ Kevin M. Downing

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Counsel for Defendant Paul J. Manafort, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July, 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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